

EXHIBIT "C"

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS,

-VS-

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ET AL.

PLAINTIFF'S MOTION FOR DISCOVERY # IV

COMES NOW, THE PLAINTIFF JIMMIE LEWIS, PRO-SE
AND SUBMITS THIS MOTION TO THIS HONORABLE COURT
IN ACCORDANCE TO THIS COURT GRANTING A ORDER
FOR DISCOVERY, IN ORDER TO BRING FORTH THE TRUTH,
THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH,
AND ASSERTS THE FOLLOWING :

DATE: 10/12/06

Jimmie Lewis
SBI # 506622

DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DE 19977

- 1.) WAS ANY OF THE INFORMATION NOTED IN DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT OF THE PLAINTIFF VIDEO RECORDED, IF YES, PROVIDE A COPY FOR REVIEW TO THE COURT.
- 2.) WAS ANY OF THE INFORMATION NOTED IN DR. FOSTER'S JUNE 10, 04 FORENSIC REPORT OF THE PLAINTIFF AUDIO RECORDED, IF YES, PROVIDE A COPY FOR REVIEW TO THE COURT.
- 3.) WHAT ARE THE SIDE EFFECTS OF EFFEXOR.
THIS IS A DUPLICATE FROM DISCOVERY MOTION # II, # 141, DUE TO IT NOT BEING LEGIBLE.
- 4.) DR FOSTER'S JUNE 10, 04 FORENSIC REPORT STATES, THAT MR. LEWIS' MOTHER TOLD THE TEAM SOCIAL WORKER THAT HE HAD BEEN ATTENTION SEEKING AS A YOUTH, AND THE HE FELT NO ONE EVER PAID ENOUGH ATTENTION TO HIM, AND THAT HE ALWAYS FELT THAT WHATEVER SOMEONE WAS DOING, THEY SHOULD STOP AND ATTEND TO HIS NEED. (DENIED BY THE PLAINTIFF, AND THE PLAINTIFF'S MOTHER.) DOES DR. FOSTER HAVE A SIGNED AFFIDAVIT FROM THE PLAINTIFF'S MOTHER, AND IS FLORENCE S. COBBS THE TEAM SOCIAL WORKER WILLING TO TESTIFY TO THIS CLAIM.
- 5.) PROVIDE A PHOTOCOPY OF DR. FOSTER'S INSURANCE AGREEMENTS AND POLICY OR POLICIES.
- 6.) PROVIDE A PHOTOCOPY OF R. GRAY'S INSURANCE AGREEMENTS AND POLICY OR POLICIES.

- 7.) PROVIDE A PHOTO COPY OF MOFFITT'S INSURANCE AGREEMENTS AND POLICY OR POLICIES.
- 8.) PROVIDE A PHOTO COPY OF SAGER'S INSURANCE AGREEMENTS AND POLICY OR POLICIES.
- 9.) PROVIDE A PHOTO COPY OF JOHNSON'S INSURANCE AGREEMENTS AND POLICY OR POLICIES.
- 10.) NAMES, ADDRESSES + PHONE #'S OF INDIVIDUALS WHO WORKED AT THE D.P.C FROM 5/21/04 TO 6/25/04 DURING THE PLAINTIFFS STAY AT THE D.P.C, FOR THE PURPOSE TO BE SUBPOENA AS WITNESSES:
DR. KATHRYN SITENEMAN, DIANE STACHOWSKI, DR. SANDHU,
DR. OUREISHI, DR. SIKETH, HELEN HANLON, JAME EVANS,
DONNA LAURENCE RN, FLORENCE S. COBBS, MARGRET WILSON,
TONYA WILSON, MARK DIGGS, ~~AND~~ GLORIA BANKS, ROSE ARES,
PAT RILEY, SETAL, C. OATES, ALICIA JAMES,
KAREN CHAMBLIN, CURTIS CORNISH,
- 11.) NAMES, ADDRESSES + PHONE #'S OF EACH WITNESS AND OR EXPERT WITNESS THAT THE DEFENDANTS MAY CALL TO PRESENT EVIDENCE DURING PRE-TRIAL OR TRIAL, ALONG WITH ALL DOCUMENTS OR REPORTS INTENDED TO BE UTILIZED DURING PRE-TRIAL PROCEDURES OR AT TRIAL.

12.) DEFENDANT(S), DR. FOSTER, R. GRAY, SAGERS, MOFFITT, JOHNSON, PROVIDE PHOTO COPIES OF YOUR D.P.C WORK SCHEDULE FOR DATES 5/21/04 TO 6/25/04.

13.) PROVIDE THE WORK SCHEDULE FOR THE FOLLOWING INDIVIDUALS WHO WERE EMPLOYEES AT THE D.P.C DATING FROM 5/21/04 TO 6/25/04, FOR THE PURPOSE OF DETERMINING WHO MAY BE QUALIFIED TO BE SUBPOENAED AS A WITNESS FOR THE PLAINTIFF AND OR THE DEFENDANTS;

MR. CURTIS CORNIS, HELEN HANLON, GLORIA BANKS, DIANE STACHOWSKI, FLORENCE S. COBBS, MARK DIGGS, TONYA WILSON, MARGRET WILSON, KAREN CHAMBLIN, KATHRYN SHENEMAN, DONNA LAURENCE, SETAL J, JAMES EVANS, C. OATES, PAT RILEY, DR. OUREISHI, DR. SHETH, DR. SANDHU, ROSE ARES, ALICIA JAMES

14.) DEFENDANT(S), DR. FOSTER, R. GRAY, SAGERS, MOFFITT, JOHNSON, PROVIDE PHOTO COPIES OF ~~THE~~ YOUR; BONDS, LEASES, BANK ACCOUNT STATEMENTS FOR THE PAST 12 MONTHS, BEQUESTS, DEVISES, ANNUITIES, PENSION AND RETIREMENT BENEFITS, NOTES, INSURANCE BENEFITS, ALL DOCUMENTS OF TITLES, DEEDS, STOCKS, WAREHOUSE AND OR STORAGE RECEIPTS, DEBENTURES, CERTIFICATES, MORTGAGES, BILLS, DEPOSIT INSTRUMENTS RELATING TO ACCOUNTS OR CERTIFICATES OF DEPOSIT OF BANKS, SAVINGS AND LOAN STATEMENTS, JUDGEMENTS OF LIENS, SECURITY INSTRUMENTS AND OTHER DEBTS AND OBLIGATIONS IN WRITING OF WHATEVER KIND, INDORSEMENTS, ACQUITTANCES, 1040 OR 1040EZ + W2 TAX FORMS.

- 15.) PROVIDE DR. FOSTER'S PREVIOUS CIVIL COMPLAINT ACTION NUMBER(S), DATE(S) AND FINAL JUDGEMENT DECISION(S) OF CIVIL COMPLAINTS PLACED AGAINST YOU.
- 16.) PROVIDE R. GRAJ'S PREVIOUS CIVIL COMPLAINT ACTION NUMBER(S), DATE(S) AND FINAL JUDGEMENT DECISION(S) OF CIVIL COMPLAINTS PLACED AGAINST YOU.
- 17.) PROVIDE MOFFITT'S PREVIOUS CIVIL COMPLAINT ACTION NUMBER(S), DATE(S), AND FINAL JUDGEMENT DECISION(S) OF CIVIL COMPLAINT(S) PLACED AGAINST YOU.
- 18.) PROVIDE SAGER'S PREVIOUS CIVIL COMPLAINT ACTION NUMBER(S), DATE(S), AND FINAL JUDGEMENT DECISION(S) OF CIVIL COMPLAINT(S) PLACED AGAINST YOU.
- 19.) PROVIDE JOHNSON'S PREVIOUS CIVIL COMPLAINT ACTION NUMBER(S), DATE(S), AND FINAL JUDGEMENT DECISION(S) OF CIVIL COMPLAINT(S) PLACED AGAINST YOU.
- 20.) DEFENDANTS, PHOTO COPIES OF YOUR JOB CONTRACT FOR THE D.P.C FOR WHICH SHOULD COVER DATES 5/21/04 TO 6/25/04, AS WELL AS EXPECTED DUTIES & OBLIGATIONS
- 21.) DEFENDANTS, WHAT WERE YOUR JOB TITLES FOR DATES 5/21/04 TO 6/25/04.

22.) WOULD DR. FOSTER OBJECT TO A BOARD CERTIFIED FORENSIC PSYCHIATRIST ANALYZING THE D.P.C DOCTORS NOTES, ~~PREPARE~~ THE D.P.C PROGRESS NOTES, AND HER JUNE 10, 04 FORENSIC REPORT, THEN SUBMITTING A REPORT ON THE SAID MATERIALS, IF YES, STATE THE REASON WHY.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS PRO-SE
DUE HEREBY CERTIFY ON THIS 12 TH DAY OF
SEPT, 2006, THAT I DID MAIL ONE TRUE
AND CORRECT COPY OF THE PLAINTIFF'S MOTION FOR
DISCOVERY # IV TO THE FOLLOWING:

CLERK OF THE COURT (GMS)
J. CALEB BOGGS FEDERAL BUILDING
844 N KING ST, LOCKBOX 18
WILMINGTON, DE 19801

CYNTHIA BEAM ESQ
1001 JEFFERSON PLAZA, SUITE 202
WILMINGTON, DE 19801

GREGORY E. SMITH
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 7TH FL
CARVEL STATE BUILDING
WILMINGTON, DE 19801

DATE: 10/12/06

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